

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 19-115

TAL PRIHAR

**MOTION FOR PRELIMINARY ORDER OF CRIMINAL FORFEITURE  
AGAINST TAL PRIHAR**

AND NOW comes the United States of America by and through its counsel, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District of Pennsylvania, and pursuant to Federal Rule of Criminal Procedure 32.2, respectfully moves for a preliminary order of forfeiture, and in support thereof, represents as follows:

1. On March 31, 2021, Tal Prihar ("Prihar") entered a guilty plea to Count One of the Indictment at Criminal No. 19-115. Prihar also agreed to forfeit all right, title, and interest in the following property (the "Subject Property") to the United States, pursuant to 18 U.S.C. § 982(a)(1):

- a. Virtual Currency Accounts:
  1. OKCoin (corporate account in the name of Wwwcom LTD);
  2. Kraken (individual account in the name of Tal Prihar);
  3. Binance account under the control of Tal Prihar;
  4. All virtual currency including private keys, recovery seeds, and/or passwords under the control of Tal Prihar;
- b. Bank Accounts:
  1. TBC Bank in Georgia, account numbers GE69 TBXXXXXXXXXXXX X000 05; GE17 TBXXXXXX XXXX XXXXX000 26; and GE94 TBXX XXXX XXXX X000 01 (all in the name of Tal Prihar);
- c. Other:
  1. The DeepDotweb.com (DDW) Domain and the contents of the DDW server or site;

2. One Asus model X510U laptop computer, S/N J8N0B600084932B with charger and USB cable; and
3. One black Apple iPhone in black case, with charger.

2. The United States respectfully requests that the Court enter a Preliminary Order of Criminal Forfeiture and that the forfeiture of Prihar's interest in the Subject Property be incorporated into his sentence and judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

3. Upon the issuance of the Preliminary Order of forfeiture against Prihar, the United States will provide written notice to all third parties, if any, known to the United States who may have an interest in the Subject Property. The United States will also advertise notice of this forfeiture proceeding via the government's internet forfeiture website.

WHEREFORE, the United States respectfully requests that this Honorable Court enter a Preliminary Order of Criminal Forfeiture forfeiting to the United States all right, title and interest of the defendant in the Subject Property, and that the forfeiture of the defendant's interest in the Subject Property be incorporated into his sentence and judgment.

Respectfully submitted,

STEPHEN R. KAUFMAN  
Acting United States Attorney

/s/ Lee J. Karl  
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**CERTIFICATE OF SERVICE**

I hereby certify that the United States' Motion for Preliminary Order of Criminal Forfeiture against Tal Prihar has been served through the electronic filing system this 27<sup>th</sup> day of April, 2021, upon the following:

Michael A. Comber, Esquire  
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*/s/ Lee J. Karl* \_\_\_\_\_  
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